

UNITED STATES DISTRICT COURT

for the
Western District of Washington

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)
Information associated with One Target Instagram
Account with Identifier penthouse_bentley, for
Investigation of 18 U.S.C. § 1591(a))
Case No. MJ23-103

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A, attached hereto and incorporated herein by reference.

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, attached hereto and incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. 1591(a)	Sex Trafficking by Force, Fraud, and Coercion

The application is based on these facts:

- See Affidavit of Christopher Miranda, continued on the attached sheet.

Delayed notice of days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: by reliable electronic means; or: telephonically recorded.

CHRISTOPHER P MIRANDA

Digitally signed by CHRISTOPHER P
MIRANDA
Date: 2023.03.01 08:45:44 -08'00'

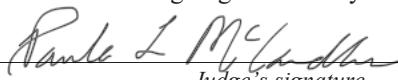
Applicant's signature

Christopher Miranda, Special Agent, HSI

Printed name and title

- The foregoing affidavit was sworn to before me and signed in my presence, or
- The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 03/03/2023


Judge's signature

City and state: Seattle, Washington

Paula L. McCandlis, United States Magistrate Judge

Printed name and title

1 | **AFFIDAVIT OF CHRISTOPHER MIRANDA**
2 |
3 | STATE OF WASHINGTON)
4 |) ss
5 | COUNTY OF KING)
6 |
7 | I, Christopher Miranda, being first duly sworn, depose and state as follows:
8 |
9 | **INTRODUCTION AND AGENT BACKGROUND**
10 |
11 | 1. I am a Special Agent (SA) with Homeland Security Investigations (HSI) and
12 | have been since 2020. I am currently assigned to the Human Trafficking Investigations group
13 | in Seattle, Washington. Prior to transferring to Seattle, I was assigned to the Gang
14 | Investigations group in Charlotte, North Carolina, where I conducted criminal investigations
15 | on both foreign and domestic gangs. These investigations consisted of narcotics trafficking,
16 | human trafficking, weapons-related offenses, violent crime, and money laundering.
17 |
18 | 2. Prior to joining HSI, I was a police officer with the Charlotte-Mecklenburg
19 | Police Department for almost eight years, where I spent most of my career assigned to Street
20 | Crime Investigations. Street Crime Investigations were focused on narcotics, gang members
21 | and violent crime offenders. During my law enforcement career, I have both applied for and
22 | served hundreds of arrest and search warrants related to a wide array of both state and federal
23 | criminal investigations. I have also attended numerous advanced investigation courses in the
24 | fields of Human Trafficking, Drug Trafficking, Gang Investigations, Cyber Investigations,
25 | and Social Media Investigations to enhance investigative techniques. I have implemented
26 | cyber and social media investigation techniques with my criminal investigations for years
27 | and know that many individuals use email, social media, and other internet-based resources
28 | to discuss and conduct criminal activity. The ability to create shadow accounts or accounts in
the name of others is often used to avoid detection by law enforcement.
29 |
30 | 3. The facts set forth in this affidavit are based on my own personal knowledge;
31 | knowledge obtained from other individuals during my participation in this investigation,
32 |

1 including other law enforcement officers; review of documents and records related to this
 2 investigation; communications with others who have personal knowledge of the events and
 3 circumstances described herein; and information gained through my training and experience.
 4 This affidavit is intended to show merely that there is sufficient probable cause for the
 5 requested warrant and does not set forth all of my knowledge about this matter.

6 **IDENTIFICATION OF THE SUBJECT ACCOUNTS TO BE SEARCHED**

7 4. I make this affidavit in support of an application under Rule 41 of the Federal
 8 Rules of Criminal Procedure for a search warrant for information associated with the
 9 following Instagram account:

10 Account ID Instagram: **penthouse_bentley** (hereinafter the SUBJECT ACCOUNT).

11 The account is an Instagram account used by the target of this investigation,

12 BRANDON WASHINGTON. Law enforcement received information regarding the
 13 SUBJECT ACCOUNT during the course of the investigation as set forth below.

14 5. The above user IDs identify an Instagram account that is stored at premises
 15 owned, maintained, controlled, or operated by Meta Platforms, Inc. (“Meta”), an electronic
 16 communications service and/or remote computing service provider headquartered at 1601
 17 Willow Road in Menlo Park, California. The information to be searched is described above
 18 and in Attachment A. This affidavit is made in support of an application for a search warrant
 19 under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A), and 2703(c)(1)(A) to require Meta to disclose to
 20 the government copies of the information (including the content of communications) further
 21 described in Section I of Attachment B. Upon receipt of the information described in
 22 Section I of Attachment B, government-authorized persons will review that information to
 23 locate the items described in Section II of Attachment B.

24 6. Based on my training and experience and the facts as set forth in this affidavit,
 25 there is probable cause to believe that violations of Title 18, United States Code, Sections
 26 1591(a) and 1591(b)(1) have been committed by BRANDON WASHINGTON. There is also
 27 probable cause to believe that WASHINGTON uses the SUBJECT ACCOUNT, and that the

1 SUBJECT ACCOUNT described in Attachment A contains evidence, instrumentalities,
 2 and/or fruits of these crimes, as further described in Attachment B.

3 **JURISDICTION**

4 7. This Court has jurisdiction to issue the requested warrant because it is “a court
 5 of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A),
 6 & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that has
 7 jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

8 **SUMMARY OF PROBABLE CAUSE**

9 **A. Investigative Background**

10 8. In June 2021, HSI Seattle received information from the Bellevue Police
 11 Department (BPD) of suspected sex trafficking that was being conducted out of Two Lincoln
 12 Tower, a luxury condominium in Bellevue, Washington. HSI Seattle initiated an
 13 investigation and obtained banking records, peer-to-peer mobile payment records, and travel
 14 records to corroborate this information.

15 9. Two Lincoln Tower condominiums in Bellevue records each entry into their
 16 building which is photographed, logged, and time stamped. These entry codes into the
 17 building are specific to each unit and can log entry by unit number. Two Lincoln Tower
 18 provided investigators with the photo log of entry for unit #3420 from August 2020 to
 19 October 2020. The log showed that in this two-month span, approximately 94 male subjects
 20 visited the unit.

21 10. On September 11, 2020, BPD responded to a disturbance call at the Two
 22 Lincoln Tower condominiums involving a black male allegedly brandishing a firearm (BPD
 23 # 2020-42610). I have reviewed the notes in the call for service. The disturbance ended prior
 24 to BPD arriving on scene. It was reported that the black male left the scene in a silver Ford
 25 Fusion displaying Nevada license plate 487K41. The Nevada vehicle registration shows it
 26 was co-registered to both BRANDON WASHINGTON (black male) and a female who will
 27 be referred to as T.G.

1 11. Investigators used T.G.'s Nevada State driver's license photo to conduct an
 2 image search, which located commercial sex ads featuring T.G. Commercial sex ads
 3 depicting T.G. were posted under the alias "Amira Yasmine" and included ads dating from
 4 2015 to 2017 on Backpage.com in California, Arizona, Nevada, and Washington. The
 5 advertisements displaying T.G. list an Instagram username of "amirayasmine1013." The
 6 numbers "1013" in the username coincide with BRANDON WASHINGTON's month and
 7 day of birth (10/13/19xx) and is frequently seen in other usernames and emails of victims
 8 identified throughout this investigation.

9 12. Investigators obtained and reviewed the rental application paperwork for unit
 10 #3420 of Two Lincoln Tower condominiums. The documentation showed that someone
 11 named "Maria Palm" had completed the rental application for unit #3420 on May 24, 2020.
 12 Applicants for this rental agreement were Sumatra Jarrett and Maria Palm. Investigators later
 13 identified Sumatra Jarrett as the mother of WASHINGTON, as listed on his California birth
 14 certificate.

15 13. During the course of this investigation, investigators have located hundreds of
 16 commercial sex advertisements depicting images of Palm, which were posted in cities and
 17 states all over the country. The dates of these advertisements range from 2018 to as recent as
 18 February 20, 2023. This most recent advertisement was posted on Privatedelights.com, a
 19 well-known website for advertising commercial sex, and was for San Jose, California.
 20 Palm's advertisements are posted under the alias "Aria" or "Aria Love" with a corresponding
 21 Instagram account of "ariaalovee_." Investigators have viewed this public Instagram account
 22 and observed that many of the photos posted on the account are the same photos that are
 23 used in commercial sex ads featuring Palm.

24 **B. Review of Bank Records**

25 14. On June 6, 2022, Bank of America provided investigators with bank records
 26 for a listed account of Maria Palm (# xxxxxxxx2801) (hereinafter the "Palm Account") for
 27 the time period of May 2020 to February 2022. Maria Palm is the only accountholder listed
 28 in the records. The Bank of America accountholder was identified to be the same Maria Palm

1 associated with the Two Lincoln Tower condos through consistent date of birth, social
 2 security number, and email (MARIAGPALM2018@GMAIL.COM) provided by each.
 3 These records show that during the reported time frame, approximately \$583,517 was
 4 deposited into the Palm Account. The deposits primarily consisted of peer-to-peer
 5 transactions and ATM cash deposits and ranged from \$100 to \$7,000. Investigators
 6 reviewing the bank records were unable to identify any source of commercial employment
 7 payments. However, deposits from “NEVADA ESD” were consistently made into the Palm
 8 Account weekly from June 11, 2020, to September 8, 2021. An internet search of
 9 “NEVADA ESD” indicates that these payments constitute State of Nevada unemployment
 10 benefits.

11 15. Cash deposits into the Palm Account were made in several different states,
 12 including California, Washington, and Florida. I am aware that numerous commercial sex
 13 advertisements featuring Palm were posted in these three states during the May 2020 to
 14 February 2022 time frame.

15 16. On numerous occasions, these cash ATM deposits were completed in different
 16 states on the same date. As an example, on April 15, 2021, at 8:47 p.m. PDT, a cash deposit
 17 of \$5,510 was made into the Palm Account at an ATM in Bellevue, Washington. On the
 18 same date, at 3:49 p.m. EDT, a \$310 cash deposit into the Palm Account was made at an
 19 ATM in Fort Lauderdale, Florida. Just two days prior on April 13, 2021, at 10:57 p.m. PDT,
 20 a \$560 cash deposit was made into the Palm Account at an ATM in Los Angeles, California.
 21 From my training and experience, this is consistent with several victims, all of whom are
 22 based in different locations, depositing the cash proceeds from commercial sex into a central
 23 bank account, which is often controlled by a trafficker or traffickers.

24 17. Bank of America was served with legal process and was requested to provide
 25 ATM transaction photos for the following transactions on the Palm Account:

26 12/1/2021- \$320 cash withdrawal from Terminal ID ICAH6317 (Fairfield, CA)

27 12/2/2021- \$400 cash withdrawal from Terminal ID ICAH4735 (Santa Clara, CA)

28 4/15/2021- \$5,510 cash deposit into Terminal ID IWAD0182 (Bellevue, WA)

1 4/15/2021- \$310 cash deposit into Terminal ID IFLD8023 (Fort Lauderdale, FL)
 2 4/13/2021- \$560 cash deposit into Terminal ID ICAN7660 (Los Angeles, CA)
 3 4/11/2021- \$700 cash deposit into Terminal ID IFLD8023 (Fort Lauderdale, FL)
 4 4/5/2021- \$1000 cash withdrawal from Terminal ID IFLD8023 (Fort Lauderdale, FL)
 5 3/29/2021- \$2,630 cash deposit into Terminal ID IWAN0065 (Seattle, WA)
 6 3/26/2021- \$6,230 cash deposit into Terminal ID IWADS0176 (Bellevue, WA)
 7 3/22/2021- \$2,267 cash deposit into Terminal ID ICAN2906 (Bakersfield, CA)

8 However, Bank of America was only able to provide photographs for the following
 9 transactions:

10 12/1/2021- \$320 cash withdrawal from Terminal ID ICAH6317 (Fairfield, CA)
 11 12/2/2021- \$400 cash withdrawal from Terminal ID ICAH4735 (Santa Clara, CA)
 12 4/13/2021- \$560 cash deposit into Terminal ID ICAN7660 (Los Angeles, CA)

13 18. Bank of America provided two photographs for each of the above-listed
 14 transactions. In all three transactions, the photographs depict a black male conducting the
 15 transactions. The black male photographed in the ATM security footage is consistent with
 16 BRANDON WASHINGTON after comparison to WASHINGTON's Washington State DOL
 17 and U.S. Passport photos.

18 19. A review of the Palm Account records also show a large number of peer-to-
 19 peer deposits made into the account. The majority of these deposits were made from
 20 accounts identified with the names Haylee Petty (via Zelle), Breeana Hill (via Zelle), and
 21 Emily Rockhill (via Zelle), according to the payment description. During the time frame
 22 May 2020 to June 2021, Breeana Hill used Zelle to transfer approximately \$33,359 to the
 23 Palm Account.

24 20. From March 3, 2021, to April 13, 2021, Emily Rockhill transferred
 25 approximately \$13,260 into the Palm Account and was paid approximately \$2,470 from the
 26 account. Investigators used Rockhill's Washington State driver's license photo to conduct an
 27 image search, which located commercial sex ads depicting Rockhill under the alias
 28 "Savannah" and "Savannah Skye." These ads were posted only during the period of March

1 11, 2021, to May 13, 2021, which is generally consistent with the time period of the money
 2 transfers from Rockhill to the Palm Account.

3 21. The Palm Account records also showed that Petty used Zelle to transfer
 4 approximately \$8,691 to the Palm Account. Investigators located commercial sex
 5 advertisements for Petty on TNABoard.com and Privatedelights.com (another website used
 6 to advertise commercial sex) using the alias “Keira” or “Keira London” from May 2020 to
 7 January 2022. In addition, investigators found that commercial sex ads for Palm and Petty
 8 often featured one another offering “duos.”

9 22. Bank records also show transfers from the Palm Account of approximately
 10 \$5,625 into a CashApp account with the username “Bentley.” CashApp records provided to
 11 investigators verify the owner of this “Bentley” account to be WASHINGTON. The moniker
 12 “Bentley” has also been used by WASHINGTON on his Instagram account
 13 (penthouse_bentley, the SUBJECT ACCOUNT) and an identified email of
 14 bluestripbentley1013@gmail.com. During the interviews of victims T.G. and D.A., both
 15 corroborated the fact that WASHINGTON consistently used the moniker “Bentley.”

16 23. The Palm Account records also showed regular, concurrent payments to two
 17 luxury apartment buildings: Helios Apartments in Seattle and Regatta at New River in Fort
 18 Lauderdale. Payments were made to both buildings from July 2021 through January 2022
 19 (agents received records only through February 2022). Law enforcement requested and
 20 received rental applications and agreements from each of these apartments. The records
 21 show that both Maria Palm and Haylee Petty were listed on the rental applications and
 22 agreements. They leased the apartment at Regatta at New River in Fort Lauderdale between
 23 March 31, 2021, and April 18, 2022, with a monthly rent of \$3,225. They leased an
 24 apartment at Helios Apartments in Seattle between December 1, 2020, and September 3,
 25 2021, with a monthly rent of \$3,730. They renewed the Helios lease to run from September
 26 4, 2021, until September 3, 2022, for \$4,087 a month. On both rental applications, Palm
 27 listed MARIAGPALM2018@GMAIL.COM as the contact email and (702) 613-8787 as the
 28 contact phone number.

1 24. The Palm Account records also show numerous payments to Priceline.com,
 2 which is a travel booking website, for hotel and airline reservations. Legal process was
 3 served to Priceline which returned the following:

4 • User Maria Palm (4/7/2017 – 6/13/2019)

5 ○ Email: BLUESTRIPBENTLEY1013@GMAIL.COM

6 ○ Phone number: (415) 235-7289

7 ○ Bookings: Approximately 248

8 ○ Cardholder Names: Breeana Hill (used 193 times), T.G. (48 times),
 9 Tyquesha Daniels (1 time), Maria Palm (1 time)

10 25. Priceline records show that between 2017 and 2019, approximately 248 hotel
 11 reservations were made using this account. Approximately 31 of those reservations are listed
 12 for WASHINGTON. Approximately 216 are listed under the names of 12 different females;
 13 investigators have located commercial sex ads for many of them. The Priceline account
 14 details show that only one time was Maria Palm the cardholder for any of the reservations
 15 made during this time frame. From my training and experience, these records indicate that
 16 this Priceline account is used to manage, promote, and facilitate interstate travel for
 17 commercial sex.

18 26. Starting on February 26, 2020, the Maria Palm Priceline account showed
 19 several updates to include a change of email and phone number:

20 • Maria Palm (2/26/2020 – 6/20/2022)

21 ○ Email: MARIAGPALM2018@GMAIL.COM

22 ○ Phone number: (415) 691-1304

23 ○ Bookings: Approximately 104

24 27. From February 26, 2020, the phone number of (415) 691-1304 was used in
 25 connection with approximately 100 bookings, while the number (702) 613-8787 was used in
 26 connection with four bookings. On July 5, 2022, T-Mobile provided investigators with
 27 subscriber information for (415) 691-1304, which showed that WASHINGTON was the
 28 subscriber beginning on February 2, 2020. Detailed further in this affidavit, WASHINGTON

1 also provided (415) 691-1304 as his phone number when encountered by Customs and
 2 Border Protection (CBP) in San Francisco, California on October 24, 2022.

3 **C. Identified Victim Interview**

4 28. Investigators contacted a woman identified here as T.G. and interviewed her on
 5 December 19, 2022. During this interview, T.G explained she met WASHINGTON in
 6 approximately October of 2014 via Facebook and his username was “something Bentley.”
 7 T.G. stated she had confided in WASHINGTON that her father had molested her, she was
 8 previously in foster care, and currently homeless.

9 29. T.G. stated that after communicating on social media, they decided to meet one
 10 night at her hotel. WASHINGTON told T.G. that he would be able to get her out of the
 11 situation she was in. T.G. stated that they were intimate with each other that night. T.G.
 12 explained that the next day WASHINGTON arrived in a red Audi hatchback, packed up all
 13 her belongings and drove her to a different hotel somewhere outside of Los Angeles,
 14 California. T.G. explained WASHINGTON put her in a hotel room with two other females
 15 she did not know.

16 30. T.G. explained that when they got to the hotel, WASHINGTON just dropped
 17 her off and left. The two unidentified females then explained to T.G. that they were posted
 18 on “sites” by WASHINGTON and they met men to have sex with them for money and
 19 would give all the money to WASHINGTON. They went on to explain that WASHINGTON
 20 would protect them. T.G. stated that the physical and verbal abuse from WASHINGTON
 21 began the second day she was with him when he brought her to the first hotel outside of Los
 22 Angeles. T.G. explained that when she told WASHINGTON she didn’t want to have sex for
 23 money, but he talked her into it. T.G. stated he made her feel guilty when he told her she
 24 wasted his time and that he thought she could handle it and thought she was stronger than
 25 that. T.G. stated she knows now it was just manipulation. T.G. explained that after two days
 26 in this hotel, she was raped and told WASHINGTON she wanted to leave. During the
 27 interview, T.G. became extremely emotional and stated that WASHINGTON beat her, with
 28 closed fist punches, and told her she wasn’t allowed to leave.

1 31. T.G. explained that WASHINGTON “role played” being a sex buyer with her
 2 to teach her what to say and do to sex buyers. T.G. stated that WASHINGTON controlled
 3 the sex ads and communication with the sex buyers so he knew how much each girl was
 4 making a day. T.G. explained that once a day, WASHINGTON would call each girl down
 5 individually from the hotel room to come down to give WASHINGTON the money they
 6 earned. T.G. stated that they were required to turn over all the money and never were
 7 allowed to keep any money.

8 32. T.G. explained that WASHINGTON assaulted her countless times while she
 9 was with him. T.G. stated these assaults would include closed fist punches to the face and
 10 body and he would also “choke” her. T.G. explained WASHINGTON would always choke
 11 (strangle) her with two hands and straight on. Additionally, T.G. explained that
 12 WASHINGTON made her get a tattoo of a Bentley logo on her leg; she provided a picture to
 13 investigators of the tattoo.

14 33. T.G. stated that she saw her commercial sex ads when sex buyers would show
 15 them to her in the hotel rooms and recalled the sites to include Backpage.com,
 16 TNABoard.com, and Eros.com. T.G. stated she couldn’t ask the sex buyers for help because
 17 WASHINGTON was the one communicating with them by text through the ads. T.G.
 18 explained she couldn’t ever say anything to the sex buyers because she feared the sex buyer
 19 might text the number in the ad thinking it was her but they were really communicating with
 20 WASHINGTON.

21 34. T.G. stated WASHINGTON would decide which cities and states she would
 22 travel to for commercial sex and he would book the travel and hotels in her name. T.G.
 23 recalls traveling to California, Washington, Nevada, and Florida for commercial sex. T.G.
 24 explained that as their posts progressed to high earning sites (Eros), WASHINGTON would
 25 always travel with them to be close by “to keep an eye on them.” T.G. stated that
 26 WASHINGTON had a community of pimp friends who would all discuss which cities/states
 27 were high earning or not.

1 35. T.G. also stated that, during her time of victimization by WASHINGTON, he
 2 would consistently attempt to recruit additional victims via social media and through
 3 commercial sex advertisement websites. T.G. explained that they lived in an apartment in
 4 San Francisco for a 12-month lease during which she estimated WASHINGTON recruited
 5 somewhere between 20–30 female victims and trafficked them for periods of time from a
 6 couple weeks to several months. T.G. stated she began to realize a common trend that most
 7 of the victims recruited by WASHINGTON were homeless and he would attempt to recruit
 8 women with false promises of making money and offering a “better life.”

9 **D. Identification of Instagram Account**

10 36. During the course of this investigation, investigators located an open Instagram
 11 account under the name “penthouse_bentley,” the SUBJECT ACCOUNT. The public
 12 account depicts photographs of a man whom investigators identified as WASHINGTON
 13 based on a comparison to his California driver’s license and U.S. Passport.

14 37. The SUBJECT ACCOUNT’s publicly accessible description states “If it’s not
 15 a Penthouse I can’t sleep in it, If it’s not a Gold Bentley I can’t sit in it, If it’s not a Gold jet
 16 ski I can’t ride it.” Pictures of a gold Bentley and a gold personal watercraft are posted on his
 17 account, along with pictures from luxury condos in both Seattle and the Miami/Fort
 18 Lauderdale area (based on their location tags). Instagram allows users to save their “stories”
 19 as “highlights.” These saved pictures and videos are stored under “highlights” until the user
 20 wishes to delete them. On August 4, 2022, investigators viewed the “highlights” for the
 21 SUBJECT ACCOUNT and observed a screenshot of a Washington State Vehicle Certificate
 22 of Title for a Bentley Flying Spur. The information accompanying this photo indicated it was
 23 posted 113 weeks prior to the date that it was viewed by investigators. The registered owner
 24 information was covered in the photo, but investigators were able to confirm through
 25 Washington Department of Licensing that a 2014 Bentley Flying Spur (VIN #
 26 SCBEC9ZA4EC090839) is registered to WASHINGTON with license plate BMH1827.
 27 There are several pictures of this gold Bentley on the account along with a gold in color
 28 personal watercraft, and a video posted on December 20, 2021, depicts both parked next to

1 each other. Another photo, dated 10 weeks prior to viewing, was a picture of a male holding
 2 what appears to be a large stack of currency posing in a bed with a female with the quote
 3 “WHEN WE QUIT CHASING THE H*ES WE WANT, THE GAME WILL SEND US
 4 THE H*ES WE NEED.” From my training and experience, I know that many sex traffickers
 5 and pimps refer to “pimping” as “the game” and refer to commercial sex workers as “hoes.”

6 38. Investigators also observed videos of Palm and Petty in the publicly available
 7 “highlights” for the SUBJECT ACCOUNT. For example, a video posted 68 weeks prior to
 8 investigators viewing it depicts Petty on a black jet ski. In a video posted 117 weeks prior to
 9 viewing, a video of Palm shows her in the driver’s seat of a vehicle with Petty in the front
 10 passenger seat; the video appeared to have been recorded from the back seat of the vehicle.
 11 Investigators are familiar with Palm and Petty from previously observed commercial sex ads
 12 that were compared with their driver’s license photos.

13 39. On October 24, 2022, WASHINGTON, Maria Palm, and Sophia Palm were
 14 encountered by Customs and Border Protection (CBP) in San Francisco, California after
 15 returning on inbound Korean Airlines Flight #23 from Seoul, South Korea. During this
 16 contact, WASHINGTON told CBP that he was returning from traveling with his girlfriend
 17 (Maria Palm), and her sister to Singapore for four days and Bali, Indonesia for 17 days.
 18 WASHINGTON said that he works as a freelance photographer and Maria Palm is employed
 19 as a model. WASHINGTON provided an address of 221 Gonzalez Drive, San Francisco,
 20 California 94132, an email address of Brandonwashington555@yahoo.com, and a phone
 21 number of (415) 691-1304. This (415) 691-1304 phone number was discussed above as it is
 22 the primary number for the Maria Palm Priceline account. WASHINGTON advised that he
 23 purchased his own ticket for this trip.

24 40. Maria Palm advised CBP that she works as a freelance model and her
 25 boyfriend, WASHINGTON, works as a freelance photographer. Maria Palm provided CPB
 26 Officers with an email of mariagrpalm2018@gmail.com. It is unknown if the additional “r”
 27 in the email address was a transcription error by CBP Officers or was intentional. Maria
 28

1 Palm provided CBP with the phone number of (702) 613-8787 and stated that she purchased
 2 the trip tickets.

3 41. Following WASHINGTON's return from Bali, the SUBJECT ACCOUNT
 4 displayed a new "highlight." The "highlight" is titled "Bali" and features approximately 100
 5 videos and photos in the file. Investigators viewed the Bali highlight and observed videos
 6 and pictures of WASHINGTON, Maria Palm, and Sophia Palm while apparently in Bali.

7 **E. Additional Identified Victim Interview**

8 42. On November 18, 2022, investigators interviewed a woman identified here as
 9 D.A. During this interview, D.A. advised she was already a victim of another sex trafficker
 10 at the time when WASHINGTON initially contacted her. D.A. referred to her previous
 11 trafficker as her "pimp" from the age of 16 years old to 22 years old, when she met
 12 WASHINGTON. D.A. explained that her previous trafficker was very controlling, would not
 13 let her communicate with her family, was abusive, and did not allow her to go anywhere
 14 without him.

15 43. D.A. stated she met BRANDON WASHINGTON in the summer of 2017 after
 16 he contacted her through a phone number posted on a commercial sex advertisement of her.
 17 D.A. advised that she initially communicated with WASHINGTON through text who
 18 portrayed himself as a "trick" or sex buyer. D.A. stated she told WASHINGTON of the
 19 conditions she suffered from that pimp. D.A. advised WASHINGTON later "revealed"
 20 himself as a pimp to her and promised her a better life. D.A. went on to explain that
 21 WASHINGTON told her that if she worked for him, he would make sure she would be able
 22 to see her family, go out on her own, and be able to have her own money.

23 44. D.A. stated that the first night she was with WASHINGTON, they stayed in a
 24 hotel, and she thought he would have expected her to have sex with him. Instead,
 25 WASHINGTON told D.A. he wanted her to "be in it for the long haul" and she was to earn
 26 him \$30,000 before that could happen. D.A. explained that the next day, they picked up T.G.
 27 (the victim discussed above) from a house in California and all three drove back to Seattle
 28 together. D.A. stated that WASHINGTON told her this was a "test" to see if she would

1 return to her previous trafficker. D.A. was explicitly told that T.G. was his “bottom”; this is a
 2 commonly used term in pimp culture referring to the “main girl.” “Bottoms” are frequently
 3 required to instruct other victims, collect money, book hotel rooms, and post ads at the
 4 direction of their pimp/trafficker.

5 45. D.A. explained that WASHINGTON had her open a Bank of America bank
 6 account under her name and give him the debit card linked to the account. D.A. explained
 7 the purpose of the account was to deposit the cash she made from the commercial sex and
 8 WASHINGTON controlled the account. D.A. explained she only accepted cash for
 9 commercial sex acts at the time and was required to give it all over to WASHINGTON.

10 46. D.A. explained that after she earned the required initial \$30,000 for
 11 WASHINGTON, he flew them out to New York. D.A. stated that WASHINGTON booked
 12 this trip to New York for her to “sign the contract” and get a Bentley logo tattoo, for his
 13 nickname of “Bentley.” D.A. stated that WASHINGTON brought a typed “contract” for her
 14 to sign while in New York. D.A. advised she could not recall what exactly the contract stated
 15 but summarized it was in reference to being loyal to WASHINGTON. D.A. stated that
 16 WASHINGTON made her “sign” the contract with her thumb print using her own blood as
 17 ink. D.A. went on to explain she knows of at least one other victim (T.G.) who also has a
 18 Bentley logo tattoo which she has seen.

19 47. Investigators executed a search warrant on WASHINGTON’s
 20 bluestripbentley1013@gmail.com email account in which the “contract” was observed. This
 21 seven-page contract was titled “Contract of Ownership” and listed D.A. by name and “King
 22 Bentley” as the involved parties. Throughout the contract, D.A. is referred to as “the slave.”

23 48. D.A. stated that, from the very beginning, WASHINGTON would lecture her
 24 for hours about “the game” (a common term used to refer to pimping), loyalty, and being on
 25 time. D.A. explained WASHINGTON would set “goals” for her rather than specific quotas
 26 of number of dates required by her.

27 49. D.A. explained she didn’t have access to any of the commercial sex
 28 advertisements or accounts related to the ads. D.A. stated WASHINGTON controlled the

1 commercial sex ads, and she specifically remembers a TNAborder.com account because
 2 WASHINGTON took a picture of her holding a newspaper for account verification. D.A.
 3 stated WASHINGTON posted ads of her on various commercial sex sites using the alias
 4 "Helena."

5 50. D.A. explained that WASHINGTON would create the accounts and posts on
 6 her phone and would make her list the posts. D.A. believes the number listed in the sex ads
 7 was a number created through an app rather than the actual cellphone number. D.A. recalls
 8 communicating with WASHINGTON through an app called "Telegram."

9 51. D.A. also explained all of her travel to other cities and states for the purpose of
 10 commercial sex would be reserved online by WASHINGTON or T.G., who was the
 11 "bottom" at the time, under T.G.'s name. D.A. explained these states included Oregon,
 12 California, Washington, and Hawaii.

13 52. D.A. explained that WASHINGTON was extremely violent and assaults
 14 towards her included closed fist punches, "choking" her with both hands to the point of
 15 nearly blacking out, open hand slaps, and she was threatened to be thrown off a 37th floor
 16 penthouse balcony in Seattle (Helios Apartments). D.A. stated these assaults happened often
 17 and would be the result of "talking back" or essentially anything that wasn't a "yes" to
 18 WASHINGTON.

19 **F. Linked Accounts**

20 53. Both D.A. and T.G. explained that during their time of victimization by
 21 WASHINGTON, he would control and post commercial sex ads of them. Both victims told
 22 investigators they were aware that WASHINGTON utilized TNABorder.com as one of the
 23 commercial sex ad websites.

24 54. Investigators contacted TNABorder.com requesting account creation
 25 information for some identified victims of this investigation. TNABorder.com collects and
 26 stores account creation and verification information which often includes email, phone
 27 numbers, the city where the ads will be posted, a photo of an identification card, a photo of
 28 the "account user," and whether they were referred by a "verified account."

1 55. On December 20, 2022, TNABoard.com provided account creation
 2 information for an account featuring Maria Palm, “Arialove.” TNABoard.com stated that the
 3 “Arialove” account was initially referred by “Helena111” on May 31, 2018. This
 4 corroborates information provided by D.A. during her interview in which she stated
 5 WASHINGTON posted ads for her under the alias “Helena.”

6 56. Below are the listed email accounts used on TNABoard.com for identified
 7 victim accounts:

- 8 • T.G. – amirayasmine1013@gmail.com
- 9 • D.A. – helenababy1013@gmail.com
- 10 • Maria Palm – arialove1013@gmail.com

11 As previously mentioned, the numbers “1013” coincide with WASHINGTON’s month and
 12 day of birth (10/13/19xx).

13 57. In addition to the requested information, TNABoard.com provided
 14 information for nine additional accounts that were “referred BY Arialove acct, or associated
 15 accounts, and our review of site usage leads us to believe they are in fact associated.”

16 58. The two newest associated accounts provided by TNABoard.com were created
 17 in December of 2022. These accounts were “Giannarosexoxo” and “Brookesummers.”
 18 Investigators reviewed the “Giannarosexoxo” account creation information provided by
 19 TNABoard.com. It included a photograph of an Arizona ID card for an Angelique Anderson
 20 and verification photos of herself holding the ID card and a piece of paper reading “TNA
 21 12/12/2022.” Investigators located an Instagram account for Angelique Anderson,
 22 “pretty.younthingg”; one of the pictures on her Instagram account is also used in sex
 23 advertisements for her. The description portion of her Instagram account includes the term
 24 “Bentley Bunny.”

25 59. Investigators also reviewed the account creation information for
 26 “Brookesummers”, which was also referred by the “Arialove” account. Investigators had
 27
 28

1 previously identified Tori Loughlin in the review of Priceline records.¹ Investigators
 2 compared known driver's license photos of Tori Loughlin to the commercial sex ads for
 3 "BrookeSummers," which were consistent. Investigators also found commercial sex ads on
 4 Privatedelights.com for "BrookeSummers" listing the same contact number provided to
 5 TNAbroad (206-750-1124). Investigators also located an Instagram account for Tori
 6 Loughlin, "ilypradaokbye." Like with Angelique Anderson, one of the pictures of Tori
 7 Loughlin on her Instagram account is also used in sex advertisements for her, and the
 8 description portion of her Instagram account includes the term "Bentley Bunny." As
 9 previously mentioned, "Bentley" is the commonly used moniker for WASHINGTON.

10 60. Both Tori Loughlin and Angelique Anderson have confirmation reservation
 11 emails through the Priceline.com account, emailed to mariagpalm2018@gmail.com. The
 12 following reservation confirmations listing Tori Loughlin and Angelique Anderson were
 13 emailed to mariagpalm2018@gmail.com:

14 11/14/2022:

- 15 • Delta Airlines flight from Phoenix, AZ to Seattle, WA.
- 16 • Passengers: WASHINGTON, Tori Loughlin, Angelique Jade Anderson

17 11/15/2022:

- 18 • 3-night hotel reservation for Hilton Bellevue, WA
- 19 • Reservation Name: Tori Loughlin

20 11/23/2022:

- 21 • Alaska Airlines flight from Seattle, WA to Phoenix, AZ
- 22 • Passengers: Tori Loughlin, Angelique Jade Anderson

23 61. Based upon the information detailed above, as well as my training and
 24 experience investigating sex trafficking cases, and corroborating information from

25 _____
 26 ¹ Investigators previously executed a search warrant for the email accounts mariagpalm2018@gmail.com and
 27 bluestripbently1013.com. During a search of the email records for email account mariagpalm2018@gmail.com,
 28 numerous emails from Priceline.com listed various females for hotel and airfare reservations. Tori Loughlin was one of
 these women identified in these reservations. A search of "Tori Loughlin" through law enforcement databases yielded a
 Tori Loughlin with a driver's license out of Wyoming and Arizona. Investigators were able to obtain the photos from
 these driver's licenses.

1 interviewed victims T.G. and D.A., I have probable cause to believe BRANDON
 2 WASHINGTON is sex trafficking adult female victims throughout the United States using
 3 force, fraud, and coercion as defined in Title 18, United States Code, Section 1591(a). I also
 4 have probable cause to believe that evidence of WASHINGTON's sex trafficking will be
 5 found in the records of the Instagram account "penthouse_bentley."

6 **BACKGROUND CONCERNING INSTAGRAM²**

7 62. I know from my training and experience that Instagram is a service owned by
 8 Meta, a United States company and a provider of an electronic communications service as
 9 defined by 18 U.S.C. §§ 3127(1) and 2510. Specifically, Instagram is a free-access social
 10 networking service, accessible through its website and its mobile application, which allows
 11 subscribers to acquire and use Instagram accounts, like the SUBJECT ACCOUNT listed in
 12 Attachment A, through which users can share messages, multimedia, and other information
 13 with other Instagram users and the general public.

14 63. Meta collects basic contact and personal identifying information from users
 15 during the Instagram registration process. This information, which can later be changed by
 16 the user, may include the user's full name, birth date, gender, contact e-mail addresses,
 17 physical address (including city, state, and zip code), telephone numbers, credit card or bank
 18 account number, and other personal identifiers. Meta keeps records of changes made to this
 19 information.

20 64. Meta also collects and retains information about how each user accesses and
 21 uses Instagram. This includes information about the Internet Protocol ("IP") addresses used
 22 to create and use an account, unique identifiers and other information about devices and web
 23 browsers used to access an account, and session times and durations.

24 65. Each Instagram account is identified by a unique username chosen by the user.
 25 Users can change their usernames whenever they choose, but no two users can have the same
 26

27 28 ² The information in this section is based on information published by Meta on its Instagram website, including, but not
 limited to, the following webpages: "Data Policy," <https://help.instagram.com/519522125107875>; "Information for Law
 Enforcement," <https://help.instagram.com/494561080557017>; and "Help Center," <https://help.instagram.com>.

1 usernames at the same time. Instagram users can create multiple accounts and, if “added” to
 2 the primary account, can switch between the associated accounts on a device without having
 3 to repeatedly log in and log out.

4 66. Instagram users can also connect their Instagram and Facebook accounts to
 5 utilize certain cross-platform features, and multiple Instagram accounts can be connected to a
 6 single Facebook account. Instagram accounts can also be connected to certain third-party
 7 websites and mobile apps for similar functionality. For example, an Instagram user can
 8 “tweet” an image uploaded to Instagram to a connected Twitter account or post it to a
 9 connected Facebook account, or transfer an image from Instagram to a connected image
 10 printing service. Meta maintains records of changed Instagram usernames, associated
 11 Instagram accounts, and previous and current connections with accounts on Meta and third-
 12 party websites and mobile apps.

13 67. Instagram users can “follow” other users to receive updates about their posts
 14 and to gain access that might otherwise be restricted by privacy settings (for example, users
 15 can choose whether their posts are visible to anyone or only to their followers). Users can
 16 also “block” other users from viewing their posts and searching for their account, “mute”
 17 users to avoid seeing their posts, and “restrict” users to hide certain activity and prescreen
 18 their comments. Instagram also allows users to create a “close friends list” for targeting
 19 certain communications and activities to a subset of followers.

20 68. Users have several ways to search for friends and associates to follow on
 21 Instagram, such as by allowing Meta to access the contact lists on their devices to identify
 22 which contacts are Instagram users. Meta retains this contact data unless deleted by the user
 23 and periodically syncs with the user’s devices to capture changes and additions. Users can
 24 similarly allow Meta to search an associated Facebook account for friends who are also
 25 Instagram users. Users can also manually search for friends or associates.

26 69. Each Instagram user has a profile page where certain content they create and
 27 share (“posts”) can be viewed either by the general public or only the user’s followers,
 28

1 depending on privacy settings. Users can customize their profile by adding their name, a
 2 photo, a short biography (“Bio”), and a website address.

3 70. One of Instagram’s primary features is the ability to create, edit, share, and
 4 interact with photos and short videos. Users can upload photos or videos taken with or stored
 5 on their devices, to which they can apply filters and other visual effects, add a caption, enter
 6 the usernames of other users (“tag”), or add a location. These appear as posts on the user’s
 7 profile. Users can remove posts from their profiles by deleting or archiving them. Archived
 8 posts can be reposted because, unlike deleted posts, they remain on Meta’s servers.

9 71. Users can interact with posts by liking them, adding or replying to comments,
 10 or sharing them within or outside of Instagram. Users receive notification when they are
 11 tagged in a post by its creator or mentioned in a comment (users can “mention” others by
 12 adding their username to a comment followed by “@”). An Instagram post created by one
 13 user may appear on the profiles or feeds of other users depending on a number of factors,
 14 including privacy settings and which users were tagged or mentioned.

15 72. An Instagram “story” is similar to a post but can be viewed by other users for
 16 only 24 hours. Stories are automatically saved to the creator’s “Stories Archive” and remain
 17 on Meta’s servers unless manually deleted. The usernames of those who viewed a story are
 18 visible to the story’s creator until 48 hours after the story was posted.

19 73. Instagram allows users to broadcast live video from their profiles. Viewers can
 20 like and add comments to the video while it is live, but the video and any user interactions
 21 are removed from Instagram upon completion unless the creator chooses to send the video to
 22 IGTV, Instagram’s long-form video app.

23 74. Instagram Direct, Instagram’s messaging service, allows users to send private
 24 messages to select individuals or groups. These messages may include text, photos, videos,
 25 posts, profiles, and other information. Participants to a group conversation can name the
 26 group and send invitations to others to join. Instagram users can send individual or group
 27 messages with “disappearing” photos or videos that can only be viewed by recipients once or
 28 twice, depending on settings. Senders can’t view their disappearing messages after they are

1 sent but do have access to each message's status, which indicates whether it was delivered,
 2 opened, or replayed, and if the recipient took a screenshot. Instagram Direct also enables
 3 users to video chat with each other directly or in groups.

4 75. Instagram offers services such as Instagram Checkout and Facebook Pay for
 5 users to make purchases, donate money, and conduct other financial transactions within the
 6 Instagram platform as well as on Facebook and other associated websites and apps.
 7 Instagram collects and retains payment information, billing records, and transactional and
 8 other information when these services are utilized.

9 76. Instagram has a search function which allows users to search for accounts by
 10 username, user activity by location, and user activity by hashtag. Hashtags, which are topical
 11 words or phrases preceded by a hash sign (#), can be added to posts to make them more
 12 easily searchable and can be "followed" to generate related updates from Instagram. Meta
 13 retains records of a user's search history and followed hashtags.

14 77. Meta collects and retains location information relating to the use of an
 15 Instagram account, including user-entered location tags and location information used by
 16 Meta to personalize and target advertisements.

17 78. Meta uses information it gathers from its platforms and other sources about the
 18 demographics, interests, actions, and connections of its users to select and personalize ads,
 19 offers, and other sponsored content. Meta maintains related records for Instagram users,
 20 including information about their perceived ad topic preferences, interactions with ads, and
 21 advertising identifiers. This data can provide insights into a user's identity and activities, and
 22 it can also reveal potential sources of additional evidence.

23 79. In some cases, Instagram users may communicate directly with Meta about
 24 issues relating to their accounts, such as technical problems, billing inquiries, or complaints
 25 from other users. Social networking providers like Meta typically retain records about such
 26 communications, including records of contacts between the user and the provider's support
 27 services, as well as records of any actions taken by the provider or user as a result of the
 28 communications.

1 80. For each Instagram user, Meta collects and retains the content and other
 2 records described above, sometimes even after it is changed by the user (including
 3 usernames, phone numbers, email addresses, full names, privacy settings, email addresses,
 4 and profile bios and links).

5 **KNOWLEDGE REGARDING USE OF INSTAGRAM ACCOUNTS AS**
 6 **INSTRUMENTALITIES OF THE CRIME**

7 81. The use of an Instagram account to facilitate sex trafficking and interstate
 8 transportation for the purpose of prostitution is not unusual. Through my investigative
 9 experience, and based upon training and conversations with other law enforcement officers
 10 involved in sex trafficking/prostitution investigations, I am aware that persons involved in
 11 prostitution and sex trafficking often use social networking websites, including Instagram, as
 12 a tool or instrumentality in committing their criminal activity. Specifically, pimps and sex
 13 traffickers often use Instagram to identify potential recruits, to communicate with these
 14 recruits via Instagram direct messaging or posts on a victim's "wall," and to keep track of
 15 their victims and their whereabouts.

16 82. I am also aware from my training and experience that pimps and sex traffickers
 17 will often take pictures of the females working for them and post these pictures on their
 18 Instagram accounts. I am also aware from my training and experience that pimps and sex
 19 traffickers will often transport their victims to different cities and states to work as
 20 prostitutes. In such situations, pimps and sex traffickers will sometimes post on their
 21 Instagram accounts about the locations where they are visiting and how much money they
 22 are making at these locations.

23 83. I am also aware from my training and experience that sex traffickers will often
 24 use the Internet to identify and recruit potential victims. In my experience, traffickers will
 25 often utilize social media websites such as Instagram to identify individuals who might be
 26 vulnerable to their coercion and exploitation.

27 84. Here, WASHINGTON used the SUBJECT ACCOUNT to brag about his
 28 activities, including displaying his profits from sex trafficking women and the locations

1 where he was traveling to engage in trafficking women in commercial sex. Additionally,
 2 T.G., D.A., and other apparent sex trafficking victims used their Instagram accounts to
 3 advertise commercial sex. In my experience, it is common for pimps and sex traffickers to
 4 control the Instagram or other social media accounts of their victims.

5 85. Based upon the information set forth above, I believe that the SUBJECT
 6 ACCOUNT is an instrumentality of Sex Trafficking by Force, Fraud, or Coercion and is
 7 permeated with evidence of these crimes. A search of the SUBJECT ACCOUNT is needed
 8 to further establish WASHINGTON is the user of the SUBJECT ACCOUNT, to determine
 9 locations where WASHINGTON has engaged in sex trafficking, and to identify other
 10 potential victims who may have been exploited by WASHINGTON, among other things.

11 86. Based upon the information set forth above, I believe that the SUBJECT
 12 ACCOUNT will contain evidence, instrumentalities, contraband, and fruits of the violations
 13 of Title 18, United States Code, Section 1591(a) (Sex Trafficking by Force, Fraud, and
 14 Coercion).

15 **POTENTIAL RELEVANCE OF DATA FROM INSTAGRAM ACCOUNTS**

16 87. In my training and experience, evidence of who was using Instagram and from
 17 where, and evidence related to criminal activity of the kind described above, may be found in
 18 the files and records described above. This evidence may establish the “who, what, why,
 19 when, where, and how” of the criminal conduct under investigation, thus enabling the United
 20 States to establish and prove each element or, alternatively, to exclude the innocent from
 21 further suspicion.

22 88. For example, the stored communications and files connected to the SUBJECT
 23 ACCOUNT may provide direct evidence of the offenses under investigation. Based on my
 24 training and experience, instant messages, emails, voicemails, photos, videos, and documents
 25 are often created and used in furtherance of criminal activity, including to communicate and
 26 facilitate the offenses under investigation.

27 89. Account activity may also provide relevant insight into the account owner’s
 28 state of mind as it relates to the offenses under investigation. For example, information in the

1 SUBJECT ACCOUNT may indicate the owner's motive and intent to commit a crime (e.g.,
 2 information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting
 3 account information in an effort to conceal evidence from law enforcement).

4 90. Stored communications including Instagram direct messages not only may
 5 contain communications relating to crimes, but also help identify and locate the participants
 6 in those crimes. Group lists and friend lists may help identify co-conspirators. Similarly,
 7 photographs and videos may help identify and locate the account holder and any co-
 8 conspirators. Search and browsing history can also be extremely useful in identifying those
 9 using anonymous online accounts and may also constitute direct evidence of the crime of
 10 labor trafficking or money laundering to the extent the browsing history or search history
 11 might include searches and browsing history related to worksites or attempts to recruit
 12 potential victims or conducting financial transactions with the proceeds of forced labor.

13 91. With respect to this case, I anticipate that the SUBJECT ACCOUNT may
 14 contain photographs that may establish WASHINGTON's involvement in the crimes set
 15 forth above, as well as communications between WASHINGTON and co-conspirators and/or
 16 victims of his crimes. Therefore, Meta's servers are likely to contain all the material
 17 described above, including stored electronic communications and information concerning
 18 subscribers and their use of Instagram, such as account access information, transaction
 19 information, and other account information.

20 92. In addition, the user's account activity, logs, stored electronic communications,
 21 and other data retained by Meta can indicate who has used or controlled the account. This
 22 "user attribution" evidence is analogous to the search for "indicia of occupancy" while
 23 executing a search warrant at a residence. For example, subscriber information, email and
 24 messaging logs, documents, and photos and videos (and the data associated with the
 25 foregoing, such as geo-location, date, and time) may be evidence of who used or controlled
 26 the account at a relevant time. As an example, because every device has unique hardware
 27 and software identifiers, and because every device that connects to the Internet must use an
 28 IP address, IP address and device identifier information can help to identify which computers

1 or other devices were used to access the account. Such information also allows investigators
2 to understand the geographic and chronological context of access, use, and events relating to
3 the crime under investigation.

4 93. Therefore, Meta's servers are likely to contain stored electronic
5 communications and information concerning subscribers and their use of Instagram. In my
6 training and experience, such information may constitute evidence of the crimes under
7 investigation including information that can be used to identify the account's user or users.

8 **CONCLUSION**

9 94. Based on the forgoing, I request that the Court find that there is probable cause
10 to believe that the SUBJECT ACCOUNT, more particularly described in Attachment A,
11 contains evidence and instrumentalities of the crimes of Title 18, United States Code,
12 Section 1591(a) (Sex Trafficking by Force, Fraud, or Coercion), as described in Attachment
13 B, and issue the proposed search warrant.

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95. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving the warrant on Meta. Because the warrant will be served on Meta, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

CHRISTOPHER P MIRANDA  Digitally signed by CHRISTOPHER P MIRANDA
Date: 2023.03.01 08:46:39 -08'00'

CHRISTOPHER MIRANDA, Affiant
Special Agent
Homeland Security Investigations

The above-named agent provided a sworn statement to the truth of the foregoing affidavit by telephone on this 3rd day of March, 2023.

Paula L. McCandlis
PAULA L. MCCANDLIS
United States Magistrate Judge

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with Instagram account **penthouse_bentley** (the SUBJECT ACCOUNT) that is stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc., a company headquartered at 1601 Willow Road, Menlo Park, California.

ATTACHMENT B
Evidence to Be Seized

I. Information to be disclosed by Meta

To the extent that the information described in Attachment A is within the possession, custody, or control of Meta, including any messages, records, files, logs, or information that have been deleted but are still available to Meta, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Meta is required to disclose the following information to the government for the SUBJECT ACCOUNT listed in Attachment A:

a. All contact and personal identifying information, including: full name, user identification number, birth date, gender, contact e-mail addresses, Instagram passwords, Instagram security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers;

b. All activity logs for the account and all other documents showing the user's posts and other Instagram activities from January 1, 2015, to present;

c. All photos uploaded by that user ID and all photos uploaded by any user that have that user tagged in them from January 1, 2015, to present, including Exchangeable Image File (“EXIF”) data and any other metadata associated with those photos and videos;

d. All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Instagram user identification numbers; groups and networks of which the user is a member, including the groups' Instagram group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Meta applications, from January 1, 2015, to present;

e. All records or other information regarding the devices and internet browsers associated with, or used in connection with, that user ID, including the hardware model, operating system version, unique device identifiers, mobile network information, and user agent string, from January 1, 2015, to present;

f. All other records and contents of communications and messages made or received by the user from January 1, 2015, to present, including all Messenger activity, private messages, chat history, video calling and voice calling history, and pending “Friend” requests;

g. All “check ins” and other location information from January 1, 2015, to present;

h. All IP logs, including all records of the IP addresses that logged into the account from January 1, 2015, to present;

i. All records of the account’s usage of the “Like” feature, including all Instagram posts and all non-Instagram webpages and content that the user has “liked” from January 1, 2015, to present;

j. All information about the Instagram pages that the account is or was a “fan” of from January 1, 2015, to present;

k. All past and present lists of friends created by the account;

1. All records of Instagram searches performed by the account from January 1, 2015, to present;

m. The types of service utilized by the user;

n. The length of service (including start date), the types of service utilized by the user, and the means and source of any payments associated with the service (including any credit card or bank account number);

- o. All privacy settings and other account settings, including privacy settings for individual Instagram posts and activities, and all records showing which Instagram users have been blocked by the account;

1 p. All records pertaining to communications between Instagram and any
2 person regarding the user or the user's Instagram account, including contacts with
3 support services and records of actions taken;

4 q. A list of any accounts linked to the SUBJECT ACCOUNT by machine
5 cookie.

6 Meta is hereby ordered to disclose the above information to the government within **14 days**
7 of issuance of this warrant.

8

9 **II. Information to be seized by the government**

10 All information described above in Section I that constitutes fruits, contraband,
11 evidence and instrumentalities of violations of Title 18, United States Code, Section 1591(a)
12 (sex trafficking by force, fraud, or coercion) involving BRANDON WASHINGTON,
13 including for the SUBJECT ACCOUNT identified on Attachment A, information pertaining
14 to the following matters:

15 a. Evidence that BRANDON WASHINGTON, his co-conspirators, or his
16 victims are involved in prostitution or sex trafficking;

17 b. Evidence regarding the proceeds of the enumerated offense;

18 c. IP log evidence, including all records of the IP addresses that logged
19 into the account, and the dates and times such logins occurred, suggesting that
20 BRANDON WASHINGTON traveled within or outside the Western District of
21 Washington to conduct prostitution or sex trafficking;

22 d. Evidence suggesting that BRANDON WASHINGTON, his co-
23 conspirators, or his victims traveled within or outside the Western District of
24 Washington to conduct prostitution or sex trafficking;

25 e. Evidence that BRANDON WASHINGTON or his co-conspirators used
26 Instagram to recruit individuals to prostitute for him, or to intimidate or tamper with
27 victims or potential witnesses;

f. Evidence of the identities of and relationships between co-conspirators and victims;

g. Evidence of who uses or accesses the SUBJECT ACCOUNT or who exercises in any way any dominion or control over SUBJECT ACCOUNT;

h. Evidence of who communicated with the SUBJECT ACCOUNT, including records about their identities and whereabouts;

i. Log records, including IP address captures, associated with the specified account:

j. Subscriber records associated with the SUBJECT ACCOUNT, including

- 1) names, email addresses, and screen names;
- 2) physical addresses;
- 3) records of session times and durations;
- 4) length of service (including start date) and types of services

utilized;

5) telephone or instrument number or other subscriber number or identity, including any temporarily assigned network address such as internet protocol address, media access card addresses, or any other unique device identifiers recorded by Google in relation to the accounts;

6) account log files (login IP address, account activation IP addresses, and IP address history);

7) detailed billing records/logs:

8) means and source of payment; and

9) lists of all related accounts:

k. Records of communications between Meta and any person purporting to be the account holder about issues relating to the SUBJECT ACCOUNT, such as technical problems, billing inquiries, or complaints from other users about the SUBJECT ACCOUNT, to include records of contacts between the subscriber and the

1 provider's support services, as well as records of any actions taken by the provider or
2 subscriber as a result of the communications.

3 1. Information identifying accounts that are linked or associated with the
4 SUBJECT ACCOUNT.

5
6 The applied-for warrant authorizes the forensic examination of the data provided by
7 Meta pursuant to Part I of Attachment B for the purpose of identifying the electronically
8 stored data described herein. This review may be conducted by any federal or local
9 government personnel, sworn or non-sworn, assisting in the investigation, who may include,
10 in addition to law enforcement officers and agents, federal and local contractors and support
11 staff, attorneys for the government, attorney support staff, and technical experts. Pursuant to
12 the requested warrant, the FBI may deliver a complete copy of the electronic data to the
13 custody and control of attorneys for the government and their support staff for their
14 independent review.